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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

INK PROJECTS, LLC,

Plaintiff,

v.

RUBEN KASPER, LLC, RUBEN  
ESTRELLADO, and MARVIN  
ESTRELLADO,

Defendants.

Case No. 2:23-cv-1568-JCM-BNW

**STIPULATION AND ORDER TO  
EXTEND DEFENDANTS' TIME TO  
RESPOND TO PLAINTIFF'S AMENDED  
COMPLAINT (ECF NO. 2) AND TO  
OPPOSE PLAINTIFF'S VERIFIED  
MOTION FOR PRELIMINARY  
INJUNCTION AGAINST DEFENDANTS  
AND INCORPORATED MEMORANDUM  
OF POINTS AND AUTHORITIES (ECF  
NO. 9)**

**(FIRST REQUEST)**

Defendants RUBEN KASPER, LLC, RUBEN ESTRELLADO, and MARVIN  
ESTRELLADO (collectively, "Defendants"), by and through their counsel of record, Kemp Jones,  
LLP, and Plaintiff INK PROJECTS, LLC, by and through its counsel of record, Akerman LLP,  
hereby stipulate and agree as follows:

1. On October 2, 2023, Plaintiff commenced this case by filing its Complaint. ECF  
No. 1. Plaintiff subsequently filed its Amended Complaint the same day. ECF No. 2. On October  
12, 2023, Plaintiff filed its Verified Motion for Preliminary Injunction Against Defendants and  
Incorporated Memorandum of Points and Authorities ("Motion for Preliminary Injunction"). ECF  
No. 9.

2. On October 5, 2023, Plaintiff served the Summons in a Civil Action and Amended Complaint on Defendants. ECF Nos. 6, 7, 8. Under FRCP 12, the current deadline for Defendants to respond to the Amended Complaint is October 26, 2023.

3. On October 12, 2023, Plaintiff served the Motion for Preliminary Injunction on Defendants by First Class Mail and Email. ECF Nos. 9, 15. Under LR 7-2(b), the current deadline for Defendants to oppose the Motion for Preliminary Injunction is October 26, 2023.

4. To provide Defendants and their recently retained counsel with sufficient time to review and respond to Plaintiff's allegations, Plaintiff and Defendants agree that Defendants shall have up to and including December 11, 2023, to respond to Plaintiff's Amended Complaint.

5. For similar reasons, the parties agree good cause exists to extend Defendants' deadline to oppose the Motion for Preliminary Injunction given Defendants' counsel only being recently retained, pre-existing professional obligations, and unexpected personal emergencies affecting Defendants' counsel.

6. Accordingly, the parties agree to extend Defendants' deadline to respond to the Motion for Preliminary Injunction by 21 days until November 16, 2023.

7. The stipulated extensions will not prejudice the parties' rights, nor will they impact other Court-imposed deadlines established in this case. This is the first request for a continuance of these briefing deadlines.

DATED this 26th day of October, 2023.

DATED this 26th day of October, 2023.

KEMP JONES LLP

AKERMAN LLP

By: /s/ Michael Gayan

By: /s/ Natalie Winslow

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*Attorneys for Defendants* **IT IS SO ORDERED** *Attorneys for Plaintiff*

**DATED:** 10:16 am, October 27, 2023



**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**